

96-253

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1416 9th Street, Suite 1155
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SEP 03 1996

Subject: Water Use Efficiency Work Group
Agricultural Water Use Efficiency Strategy

Dear Lester:

Here are my comments on subjects discussed at the Water Use Efficiency Work Group Meeting on August 28, 1996. My first and primary comments are on the agriculture water use efficiency strategy paper. A couple of editorial comments are included also on the urban strategy paper discussed at a prior meeting.

The group generally approved of the nine objectives listed in the strategy paper dated August 22, 1996, but there were concerns that objectives would result in a planning and analysis orientation for ag water management and would not lead to implementation of ag water conservation practices. I believe that the list of objective covers a set of good points for the CALFED program, but how the objectives will impact a program is somewhat obscure. Below, I have regrouped the objectives, as now stated, to help show the action intent of the objectives: (the objectives are the same as in the 8/22 draft except for the second item under Group 2. The reason for this is the subject of the next paragraph.)

1. General objectives to guide all levels.
 - o Ensure a strong water use efficiency component in the Bay-Delta solution.
 - o Provide adequate assurance that agricultural water supplies will be used efficiently.
 - o Emphasize market tools over regulatory tools.
 - o Preserve local flexibility.
2. Action objectives for Water Suppliers and Water Users.
 - o Build on the progress and achievements of the agricultural MOU (AB 3616).
 - o Improve water management in water supplier service areas.
3. Action objectives for CALFED Agencies.
 - o Encourage analysis of water use efficiency at all levels, field to valley-wide.
 - o Offer help in the planning and financing of water use efficiency improvements.
 - o Remove institutional barriers to efficient water use.

Lester Snow
Re: Ag Water Efficiency
August 30, 1996
Page 2.

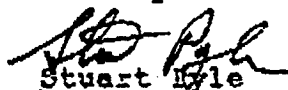
In my opinion, there is a complete disconnection between the intent of the paper to spell out a CALFED approach to agricultural water efficiency improvement and the rest of the paper devoted to analyzing "tools." The dichotomy may arise from the objective to improve water management on a statewide basis as shown in the item--"Improve water management to achieve multiple benefits." I do not argue that this is a CALFED objective but it is completely misplaced to bring it forth under the guise of an agricultural water efficiency program. As a result most of the sixteen tools describe actions that could be taken at the CALFED Agency levels to foster water management actions to achieve multiple benefits by actions as transfers to augment urban or environmental water uses (which may have adverse impacts on rural economies), reallocation or assignment of water to benefit the environment and protection for water allocations to upstream areas. Of course the tools include some actions that belong with the Ag efficiency programs. My point is that these two subjects need to be divided and addressed separately.

The tools beyond local purview listed in the ag paper are important and should be assigned to a category dealing with improved statewide water management. You should also look at the crossplay between some of the tools in the Ag paper with "assurances" and "financing" work groups. I will not try to analyze this issue any further at this point. Hopefully, you can find a forum for statewide water management. Separating these subjects from the Ag paper and concentrating on things that local water suppliers can do, and that the CALFED Agencies can assist with for improved agricultural water use efficiency, will do a lot to gain the support of the agricultural participants.

The same concerns expressed above should apply to the paper on urban water conservation; that is, a separation into general objectives, objectives related to local water suppliers, and objectives related to CALFED agencies. Some of these tools also should be considered in a forum on statewide water management.

I also have some concern about the use of jargon, such as in tool Number 1 on Page 3 of the July 25 draft of the Urban paper where references are made to "watchdog" duties, and to "brain trust of sorts." I think clear english should be used to spell out the meaning of these terms.

Sincerely


Stuart T. PVLE